

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

TONYA BRAND,

Plaintiff,

vs.

COOK MEDICAL, LLC, COOK
INCORPORATED, AND WILLIAM
COOK EUROPE,

Defendants.

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1:14-cv-6018-RLY-TAB

VERDICT FORM

1. Has the Plaintiff proven, by a preponderance of the evidence, that the design of the Celect IVC filter was defective?

Yes ✓

No _____

If your answer to Question 1 is "yes," then go to Question 2. If your answer to Question 1 is "no," then the foreperson should sign and date this form.

2. Has Plaintiff proven, by a preponderance of the evidence, that the Celect IVC filter's defective design was the proximate cause of the loss, injury, or damage to Plaintiff?

Yes ✓

No _____

If your answer to Question 2 is "yes," then go to Questions 3 and 4. If your answer to Question 2 is "no," then the foreperson should sign and date this form.

3. Has Cook proven, by a preponderance of the evidence, that Plaintiff knowingly and voluntarily exposed herself to the danger she has complained of?

Yes _____

No ✓

4. Has Cook proven, by a preponderance of the evidence, that an intervening cause broke the sequence between the defective product and the injury to Plaintiff?

Yes _____

No ✓

If you answered "yes" to Question 3 or Question 4, then your verdict is for Cook and you should sign and date this verdict form.

If you answered "no" to Question 3 and Question 4, please answer Question 5.

5. What is the total amount of Plaintiff's damages?

\$ 3,000,000.

The Foreperson should sign and date this Verdict Form.



Foreperson's Signature

Dated: 02/01/2019